REMARKS

The following is intended as a full and complete response to the Office Action mailed on February 9, 2005 having a shortened statutory period for response set to expire on May 9, 2005. Claims 1-3, 5, 7-16 and 18-22 were examined. The Examiner rejected each of these claims under 35 U.S.C. § 103(a) as obvious in view of Merrill.

Applicant is canceling claims 4, 6, 15 and 17, without prejudice.

Rejections under 35 U.S.C. § 103(a)

Claim 1, as amended, recites the limitations of a statement that contains an operation identifier that specifies an operation and pattern matching criteria as well as executing the statement by identifying a set of graphical components with identifiers that satisfy the pattern matching criteria and performing the operation on the identified set of graphical components. Merrill does not teach or suggest these limitations.

Merrill discloses an animation system that provides synchronization services to synchronize actions of two or more simultaneously displayed characters. Using animation services, applications can make animation requests to control the actions of the displayed characters. More specifically, applications can invoke script-based commands for controlling character actions, and the animation server executes these commands on an appropriate schedule to synchronize the actions of the displayed characters. See generally Merrill at Abstract and at page 1, paragraphs 7-12.

By contrast, the method of claim 1 presents a way of executing the same operation on multiple graphical components, without having to separately execute that operation on each graphical component. As recited in claim 1, a statement includes an operation identifier that specifies the operation to be executed on the multiple graphical components and a pattern

matching criteria. Importantly, as also recited in claim 1, the graphical components on which the operation is to be executed are identified using the pattern matching criteria. Specifically, all graphical components have associated identifiers, and a graphical component is identified as one on which the operation is to be executed when its corresponding identifier satisfies the pattern matching criteria.

Simply stated, Merrill provides no teachings whatsoever that are related to identifying multiple objects on which an operation is to be executed using pattern matching criteria, as recited in claim 1. The Examiner points to page 13, paragraphs 168-169 of Merrill as teaching or suggesting these limitations. This section of Merrill, however, teaches only that a bookmark tag may be used to synchronize speech output with text output. For example, a programmer may insert a bookmark tag into an output text string at the location where the programmer wants to display a window in the speech output. When the server encounters the bookmark tag in the output text string, it generates the bookmarked event – here, generating the desired window in the speech output. This disclosed functionality is vastly different than the pattern matching criteria recited in claim 1. The use of a bookmark tag does not entail any type of pattern matching to identify graphical components on which an operation is to be executed, which is the underlying functionality of the pattern matching criteria. Therefore, the bookmark tag and the claimed pattern matching criteria are not equivalent constructs.

The Examiner also appears to point to page 20, paragraph 340 of Merrill as teaching or suggesting the use of pattern matching criteria. However, this section of Merrill suffers from the same deficiencies as page 13, paragraphs 168-169. This second section of Merrill teaches only that an object tag may be used to indicate when a character should be loaded into the process space of a browser. Specifically, the browser loads the character when the interpreter encounters the object tag in the script code while translating that code. Again, there is no pattern matching

in this process. Rather, there is simply an encounter with a tag that has been placed in the code, and this encounter triggers a subsequent action (i.e., generating the window in the speech output or loading the character into the browser). Also, as before, there is no use of pattern matching to identify graphical components on which an operation is to be executed. Thus, the object tag disclosed in this part of Merrill and the claimed pattern matching criteria are not equivalent constructs.

At a higher level, one would not really expect Merrill to disclose Applicant's invention since Merrill really deals with a different problem than that solved by Applicant's invention. As described above, Merrill deals with synchronizing actions of two or more simultaneously displayed characters. Much of Merrill addresses synchronizing speech and text as well as speech and motion. On the other hand, Applicant's invention addresses the problem of efficiently performing the same operation on multiple graphical components. As set forth in the claims, Applicant's invention allows the same operation to be performed on multiple graphical components without having to separately execute that operation on each graphical component individually or writing a complicated script to run a batch operation.

As the foregoing illustrates, Merrill fails to teach or suggest each and every limitation of amended claim 1 and therefore cannot anticipate or render obvious this claim or claims 2-3, 5-8 and 21, dependent thereon.

Independent claims 8, 12 and 18 include limitations similar to those discussed above in connection with allowable amended claim 1 and therefore are in condition for allowance for at least the same reasons as amended claim 1. Since claims 9-11 and 22 depend from allowable claim 8, claims 13-14 and 16-17 depend from allowable claim 12, and claims 19-20 depend from allowable claim 18, these claims also are in condition for allowance.

Finally, at least claims 2 and 13 recite the limitation of a first string of characters that specifies the pattern matching criteria and includes at least one wild card character. As is clear from pages 13-14 of the application, a wild card character indicates that the identifier-pattern of a statement may include any type of data where the wild card character is located such that the remaining portion of the identifier-pattern constitutes the operative portion of the pattern matching criteria. The Examiner suggests that page 10, paragraphs 128-129 of Merrill and page 13, paragraph 156 of Merrill teach the use of a wild card character. Applicant respectfully disagrees with the Examiner's interpretation of these parts of Merrill. Page 10, paragraphs 128-129 disclose nothing more than the use of pointers to access functions in a virtual function table. The functionality of these pointers is not at all similar to that of the claimed wild card character. There certainly is no string of characters disclosed that includes anything remotely similar to a wild card character. Page 13, paragraph 156 states nothing more than clients of the animation server access animation services using methods, properties and events of an agent object's interface. The Examiner seems to argue, in quite conclusory fashion, that the object interface interactions somehow are functionally similar to the claimed wild card character and the pattern matching criteria. However, the Examiner provides no explanation of what this relationship is or why there is functional equivalence. Applicant therefore further submits that Merrill fails to teach or suggest the wild card character limitation recited in claims 2 and 13 and that these claims are allowable for this reason as well.

Conclusion

Based on the above remarks, Applicant believes that he has overcome all of the rejections set forth in the Office Action mailed on February 9, 2005 and that the pending and new claims are in condition for allowance. If the Examiner has any questions, please contact the Applicant's undersigned representative at the number provided below.

Respectfully submitted,

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